
From: Shane Phillips
Sent: Monday, February 10, 2014 4:07 PM
To: CEQA Guidelines
Subject: CEQA LOS replacement feedback

Hello,

In considering a replacement for LOS, I think the most important thing that can be done is to apply as light a touch as possible. Imposing onerous restrictions, whether they favor cars, bicycles, transit, or pedestrians, is likely to have a variety of consequences, and those consequences will differ depending on the locale. By allowing local jurisdictions to choose what to emphasize, cities and metropolitan areas can choose their own path, and hopefully apply standards in a much more personalized way.

As someone who strongly supports active transportation and transit I would like to see these modes treated as at least equal to cars, if not superior, given their health, economic, and environmental benefits. Rather than vehicle congestion/throughput, safety should be the number one priority. Whether that's officially the case right now or not, it's very clear that safety is actually only a priority within a certain throughput boundary -- that is, it's determined what throughput should be, then the safest design is engineered that can afford that throughput. This should be reversed, so that transportation officials are expected to do what they can to make roads and intersections safe for all users, then try to maximize throughput while maintaining those high safety standards. Again, this requires prioritizing more vulnerable users like pedestrians and bicyclists.

I think CEQA/LOS reform is a great opportunity to create a more economically and environmentally sustainable California, but I hope any replacement standards are institutionalized cautiously, with a recognition that different jurisdictions have different needs and aspirations. And that, from an environmental standpoint (and a housing affordability standpoint, since CEQA often drives up the cost of housing and limits new development), almost anything is better than the current LOS standards, including no throughput standards at all. In short, please emphasize safety, not throughput, and lean as far toward a "light touch," low-regulation standard as possible, because I think this will allow the cities that are most interested in building more walkable, bikeable, and transit-accessible neighborhoods to maximize their options, and ultimately their success.

Thanks for your time,

Shane Phillips